

**REDACTED  
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FILED

~~MAY~~ 16 2018

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

CLERK, U.S. DISTRICT CLERK  
WESTERN DISTRICT OF TEXAS  
BY                      DEPUTY

V.

### Defendants.

**THIRD**  
**SUPERSEDING INDICTMENT**

**CT 1:** [18 § 554 & 2,  
Smuggling Goods from the  
United States & Aiding and Abetting;  
**CT 2:** 18 § 922(k),  
Possession of a Firearm with a Removed  
and Obliterated  
Serial Number;  
**CT 3:** 18 § 924(c); 2,  
Possession of Firearm in Furtherance  
of a Drug Trafficking Crime & Aiding  
& Abetting;  
**CT 4:** 18 § 922(o),  
Possession of a Machine Gun  
**CT 5:** 18 § 924(c)(1)(B)(ii), 2 ,  
Possession of a Machine Gun in  
Furtherance of a Drug Trafficking  
Offense & Aiding and Abetting;  
**CT 6:** 18 § 922(g)(1),  
Felon in Possession of Firearm;  
**CT 7:** 21 § 846, 841(a)(1),  
Conspiracy to Possess a Controlled  
Substance with Intent to Distribute  
(Marijuana);  
**CT 8:** 21 § 952(a), 960(a)(1),  
960(b)(1)(G) & 963,  
Conspiracy to Import a Controlled  
Substance (Marijuana);  
**CT 9:** 18 § 924(c)(1),(o)  
Use of a Firearm in the Crime of Violence  
or Drug Trafficking Crime;  
**and Notice of United States of  
America's Demand for Forfeiture.]**

## THE GRAND JURY CHARGES:

**COUNT ONE**  
**(18 U.S.C. §§ 554 & 2)**

That beginning on or about February 24, 2016 and continuing to and including March 10, 2016, in the Western District of Texas, the Southern District of Texas, and elsewhere, the Defendants,

[REDACTED]  
**MIGUEL ANGEL TEODORO-BLANCO (9) aka "MIGUEL",**  
**HAZAEEL GONALEZ (10) aka "JACIEL"**  
**JOSE SANTIAGO SANCHEZ-**  
**CASTANEDA (11) aka "OSO"**

did knowingly facilitate the transportation and concealment and did aid and abet the facilitation of the transportation and concealment of merchandise, articles and other objects from the United States, knowing the same to be intended for exportation, contrary to law and regulation of the United States, in violation of Title 18, United States Code, Sections 554 and 2.

**COUNT TWO**  
**(18 U.S.C. § 922(k), 2)**

That on or about March 10, 2016, in the Western District of Texas, Defendants,

[REDACTED]  
did knowingly possess and aid and abet the possession of the following firearms, to wit:

1. Romarm/Cugir, WASR 10/63, .762-caliber Rifle, and
2. Romarm/Cugir, WASR 10/63, .762-caliber Rifle

that had been shipped and transported in interstate commerce and from which the manufacturer's serial number had been removed and obliterated, in violation of Title 18, United States Code, Section 922(k) and 2.

**COUNT THREE**  
**(18 U.S.C. §§ 924(c)(1)(B)(i); 2)**

That beginning on or about March 10, 2016, in the Western District of Texas, the Defendants,

[REDACTED]

did knowingly possess and aid and abet the possession of firearms, to wit: semi-automatic assault weapons, in furtherance of a drug trafficking crime, that may be prosecuted in a court of the United States, that is:

1. DPMS, A15, .223-caliber SBR, S/N F005508,
2. Bushmaster, XM15, .223-caliber Machinegun, S/N L353743;
3. Zastava, M70, 7.62-caliber Rifle, S/N 800302;
4. Zastava, M70, 7.62-caliber Rifle, S/N 800280;
5. Zastava, M70, 7.62-caliber Rifle, S/N 800288;
6. Zastava, M70, 7.62-caliber Rifle, S/N 800297;
7. Zastava, M70, 7.62-caliber Rifle, S/N 800290;
8. Zastava, M70, 7.62-caliber Rifle, S/N M70AB13659;
9. Romarm/Cugir, WASR 10/63, .762-caliber Rifle, S/N "oblit";
10. Romarm/Cugir, WASR 10/63, .762-caliber Rifle, S/N "oblit";
11. Bushmaster, XM15, .223-caliber Machinegun, S/N L353631; and
12. Bushmaster, XM15, .223-caliber Machinegun, S/N L353701

in violation of Title 18, United States Code, Section 924(c)(1)(B)(i) and 2.

**COUNT FOUR**  
**(18 U.S.C. § 922(o), 2)**

That beginning on or about March 10, 2016, in the Western District of Texas, the Defendants,

[REDACTED]

knowingly possessed and aided and abetted the possession of machineguns, to wit:

1. a Bushmaster, XM15, .223-caliber Machinegun, S/N L353631;
2. a Bushmaster, XM15, .223-caliber Machinegun, S/N L353701; and
3. a Bushmaster, XM15, .223-caliber Machinegun, S/N L528469.

in violation of Title 18, United States Code, Sections 922(o), 924(a)(2), and 2.

**COUNT FIVE**  
**(18 U.S.C. § 924(c)(1)(B)(ii), 2)**

That beginning on or about March 10, 2016, in the Western District of Texas, the Defendants,

did knowingly possess and aid and abet the possession of a firearm in furtherance of a crime of violence and a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, a Bushmaster, XM15, .223-caliber Machinegun, S/N L353631, a Bushmaster, XM15, .223-caliber Machinegun, S/N L353701, and a Bushmaster, XM15, .223-caliber Machinegun, S/N L528469, in violation of Title 18, United States Code, Section 924(c)(1)(B)(ii) and 2.

**COUNT SIX**  
**(18 U.S.C. § 922(g)(1), 2)**

That on or about March 10, 2016, in the Western District of Texas, Defendant,

[REDACTED]

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm(s), and

[REDACTED]

did aid and abet the possession of a firearm(s) by a person having been convicted of a crime punishable by imprisonment for a term exceeding one year,


to-wit:

1. DPMS, A15, .223-caliber SBR, S/N F005508,
2. Bushmaster, XM15, .223-caliber Machinegun, S/N L353743;
3. Zastava, M70, 7.62-caliber Rifle, S/N 800302;
4. Zastava, M70, 7.62-caliber Rifle, S/N 800280;
5. Zastava, M70, 7.62-caliber Rifle, S/N 800288;
6. Zastava, M70, 7.62-caliber Rifle, S/N 800297;
7. Zastava, M70, 7.62-caliber Rifle, S/N 800290;
8. Zastava, M70, 7.62-caliber Rifle, S/N M70AB13659;
9. Romarm/Cugir, WASR 10/63, .762-caliber Rifle, S/N "oblit";
10. Romarm/Cugir, WASR 10/63, .762-caliber Rifle, S/N "oblit";
11. Bushmaster, XM15, .223-caliber Machinegun, S/N L353631; and
12. Bushmaster, XM15, .223-caliber Machinegun, S/N L353701.

one or more of said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

**COUNT SEVEN**  
**(21 U.S.C. §§ 846, 841(a)(1) and 841 (b)(1)(B)(vii))**

Beginning on or about June 1, 2015 and continuing up to and including the date of this indictment, in the Western District of Texas, the Northern District of Texas, the Republic of Mexico, and elsewhere, the Defendants,


  
**MIGUEL ANGEL TEODORO-BLANCO (9) aka "MIGUEL",**  
**HAZAEEL GONALEZ (10) aka "JACIEL"**  
**JOSE SANTIAGO SANCHEZ-**  
**CASTANEDA (11) aka "OSO"**

did combine, conspire, confederate and agree together and with each other and others known and unknown to the Grand Jury to possess with intent to distribute and distribute a controlled substance, which offense involved one hundred kilograms or more of a mixture and substance containing marijuana, a Schedule I Controlled Substance, contrary to Title 21, United States Code, Section 841(a)(1) and 841 (b)(1)(B)(vii), in violation of Title 21, United States Code, Section 846.

**COUNT EIGHT**  
**(21 U.S.C. §§ 952(a), 960(a)(1), 960(b)(1)(G) & 963)**

Beginning on or about June 1, 2015 and continuing up to and including the date of this indictment, in the Western District of Texas, Defendants, knowingly, intentionally, and

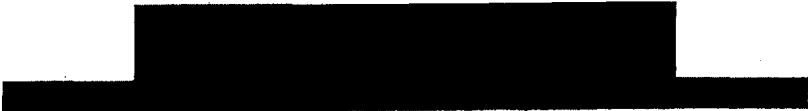
unlawfully conspired, combined, confederated, and agreed together,

  
**MIGUEL ANGEL TEODORO-BLANCO (9) aka "MIGUEL",**  
**HAZAEI GONALEZ (10) aka "JACIEL"**  
**JOSE SANTIAGO SANCHEZ-**  
**CASTANEDA (11) aka "OSO"**

and with each other, and with others to the Grand Jury unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 963, that is to say, they conspired to import a controlled substance, which offense involved one hundred kilograms or more of a mixture and substance containing marijuana, a Schedule I Controlled Substance, into the United States from Mexico contrary to Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(2)(G).

**COUNT NINE**  
**(18 U.S.C. §§ 924(c)(1) and (o))**

Beginning on or about March 1, 2016, and continuing through and including the date of this indictment, in the Western District of Texas and elsewhere, the Defendants,

  
**MIGUEL ANGEL TEODORO-BLANCO (9) aka "MIGUEL",**  
**HAZAEI GONALEZ (10) aka "JACIEL"**  
**JOSE SANTIAGO SANCHEZ-**  
**CASTANEDA (11) aka "OSO"**

knowingly combined, conspired, confederated, and agreed with each other and others known and unknown to the Grand Jury to commit offenses against the United States, that is, the **DEFENDANTS** conspired to possess firearms in furtherance of the drug trafficking crimes charged in Counts Seven and Eight of this Indictment, re-alleged herein, contrary to Title 18, United States Code, Sections 924(c)(1) and (o).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
**[See Fed. R. Crim. P. 32.2]**

**I.**

**Smuggling Violation and Forfeiture Statute**

**[Title 18 U.S.C. § 554, subject to forfeiture pursuant to Title 18 U.S.C. § 981(a)(1)(C),  
made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]**

As a result of the foregoing criminal violation as set forth in Count One, the United States of  
America gives notice to Defendants [REDACTED]

[REDACTED] of its intent to seek the forfeiture of the property described below upon conviction  
pursuant to Fed. R. Crim. P. 32.2 and subject to forfeiture pursuant to Title 18 U.S.C. §  
981(a)(1)(C) (through Title 18 U.S.C. § 1956(c)(7)), made applicable to criminal forfeiture by  
Title 28 U.S.C. § 2461, which states:

**Title 18 U.S.C. § 981.**

- (a)(1)** The following property is subject to forfeiture to the United States:  
**(C)** Any property, real or personal, which constitutes or is derived from  
proceeds traceable to . . . any offense constituting "specified unlawful  
activity" (as defined in section 1956(c)(7) of this title), or a conspiracy to  
commit such offense.

This Notice of Demand for Forfeiture includes but is not limited to the properties described in  
Paragraph III.

**II.**

**Firearms Violations and Forfeiture Statute**

**[Title 18 U.S.C. §§ 922(g)(1), 922(k), 922(o), 924(c), and 924(c)(1)(B)(ii),  
subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1),  
made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]**

As a result of the foregoing criminal violations as set forth in Counts Two through Six, the  
United States of America gives notice to Defendant [REDACTED]

[REDACTED] of its intent to seek the forfeiture of the property described below upon

conviction pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

**Title 18 U.S.C. § 924. Penalties**

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . (k) . . . of section 922 . . . or knowing violation of section 924, or willful violation of any other provision of this chapter . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter . . . .

This Notice of Demand for Forfeiture includes but is not limited to the properties described in Paragraph III.

**III.**

**Personal Properties**

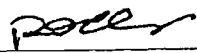
1. DPMS, A15, .223-caliber SBR, S/N F005508;
2. Bushmaster, XM15, .223-caliber Machinegun, S/N L353743;
3. Zastava, M70, 7.62-caliber Rifle, S/N 800302;
4. Zastava, M70, 7.62-caliber Rifle, S/N 800280;
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7. Zastava, M70, 7.62-caliber Rifle, S/N 800290;
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9. Romarm/Cugir, WASR 10/63, .762-caliber Rifle, S/N "oblit";
10. Romarm/Cugir, WASR 10/63, .762-caliber Rifle, S/N "oblit";
11. Bushmaster, XM15, .223-caliber Machinegun, S/N L353631;
12. Bushmaster, XM15, .223-caliber Machinegun, S/N L353701; and
13. \$28,630.71, More or Less, in United States Currency seized on March 10, 2016.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JOHN F. BASH  
UNITED STATES ATTORNEY

BY:

  
\_\_\_\_\_  
RUSSELL D. LEACHMAN  
Assistant United States Attorney